

THE SULTZER LAW GROUP, P.C.

Jason Sultzer (JS4546)
Joseph Lipari (JL3194)
85 Civic Center Plaza, Suite 104
Poughkeepsie, New York 12601
Tel: (845) 483-7100
Fax: (888) 749-7747
Email: sultzerj@thesultzerlawgroup.com
liparij@thesultzerlawgroup.com

Counsel for Defendant Lifewatch, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDWARD J. REYNOLDS, D.D.S., Individually :
and on behalf of all others similarly situated, :
Case No. 14-CV-3575

Plaintiff,

v.

LIFEWATCH, INC., LIFEWATCH CORP., :
LIFEWATCH TECHNOLOGIES CORP., :
LIFEWATCH SERVICES, INC., LIFEWATCH, :
INC. d/b/a LIFEWATCH USA, EVAN SIRLIN, :
MITCHELL MAY, ABC CORPORATIONS 1-10, :
AND JOHN DOES 1-10, :

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, and all other
prior pleadings and proceedings herein, the undersigned, on behalf of Lifewatch, Inc., will move
this Court, before Honorable Kenneth M. Karas, United States District Judge, at the United
States District Court for the Southern District of New York, located at 300 Quarrapos Street,
White Plains, New York, on a date and at a time designated by the Court, for an Order pursuant
to Rule 12(f) of the Fed. R. Civ. P. and Rule 12(b)(6) of the Fed. R. Civ. P., granting Lifewatch,

Inc.'s motion to strike all class allegations and motion to dismiss all claims, respectively, and for such other and further relief as the Court deems just and proper.

Dated: December 15, 2014

THE SULTZER LAW GROUP, P.C.

By: _____ /s/
Jason P. Sultzer, Esq.
sultzerj@thesultzerlawgroup.com